

# EXHIBIT 14

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA

U.S. EQUAL EMPLOYMENT )  
OPPORTUNITY COMMISSION, )  
Plaintiff, ) Civil Action No: 5:19-CV-4063  
v. ) Hon. Judge Linda R. Reade  
SCHUSTER CO., )  
Defendant. )  
\_\_\_\_\_  
)

### **DECLARATION OF ERIN E. GEORGE**

Pursuant to 28 U.S.C. § 1746, I, Erin E. George, state as follows:

1. I am employed as an economist in Research and Analysis Services at the United States Equal Employment Opportunity Commission.
2. I have a B.A. in political science and economics from American University and a Ph.D. in economics from American University.
3. I was asked to assess whether the CRT test has a disparate impact on a class of female conditional hires to the driver position at Schuster Company.
4. A true and correct copy of my report that accurately reflects my qualification, my opinions, and the bases for my opinions is attached as Exhibit A. By this declaration, I affirm the truth and accuracy of my report and adopt the statements in my report as if they were set forth herein.
5. I analyzed a data file from Schuster that provided a list of 1,863 scores for the CRT test administered between June 2, 2014 and February 10, 2020. As the CRT test score is relevant only for conditional hires to the driver position, the

analyses in my report were of the scores reported in the tab “Drivers Hiring Decision” [sic], which provided 1,490 test scores.

6. During the period June 2, 2014 to February 10, 2020, 95.0% of tests taken by male conditional hires to the driver position received a passing score whereas only 76.6% of tests taken by female conditional hires to the driver position received a passing score. Table 1 from my report showing this information is reproduced below.

Test Result	Male		Female		Total	
	N	Percent	N	Percent	N	Percent
Failed	66	(5.0)	41	(23.4)	107	(7.2)
Passed	1,249	(95.0)	134	(76.6)	1,383	(92.8)
Total	1,315	(100.0)	175	(100.0)	1,490	(100.0)

Table 1: CRT Test Attempts and Results by Sex, Hiring Decisions, Drivers Only

7. This disparity between male and female pass rates was 8.9 standard deviations. The likelihood of this happening due to chance, if women and men were equally likely to pass the CRT test, is less than 1 in 1,000,000,000.

8. I performed two additional analyses as sensitivity checks to confirm the main result. When considering only the highest CRT score for each test taker, 96.1 percent of men received a passing score and 81.6 percent of women received a passing score. The disparity in passing rates is statistically significant at 7.2 standard deviations. The likelihood of this happening if the pass rate of CRT was neutral with respect to sex is 1 in 1,000,000,000.

9. 26 women never achieved a passing score on the CRT test.

10. I also performed an analysis considering only the score on the first test taken by each conditional hire. Of the first test taken by men, 95.3 percent resulted in a passing score, while 76.8 percent of the first tests taken by women resulted in a passing score. The difference in passing rates is statistically significant at 8.3 standard deviations. The likelihood of this happening, if the pass rate of the CRT test was neutral with respect to sex, is less than 1 in 1,000,000,000.

11. I find that the CRT test is not neutral with respect to sex, consistent with the test having a disparate impact on women.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 14, 2021

Erin E. George  
Erin E. George